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11 *Attorneys for Defendant Synchrony Bank*

12 **IN THE UNITED STATES DISTRICT COURT
 13 DISTRICT OF NEVADA**

14 Shawnae Dowe,
 15 Plaintiff,
 16 vs.
 17 Equifax Information Services, LLC;
 18 Experian Information Solutions, Inc.;
 19 Flagstar Bank; and
 20 Synchrony Financial d/b/a SYNCB/CareCredit,
 21 Defendants.

22 Case No. 2:21-cv-01751-JCM-EJY

23 **JOINT MOTION AND ORDER
 24 TO EXTEND DEFENDANT
 25 SYNCHRONY BANK'S TIME TO
 26 FILE RESPONSE TO COMPLAINT
 27 [FIRST REQUEST]**

28 COME NOW Plaintiff Shawnae Dowe (“Plaintiff”) and Defendant Synchrony Bank
 29 (misidentified as “Synchrony Financial d/b/a SYNCB/CareCredit,” and hereinafter referred to
 30 as “Synchrony”), by counsel and pursuant to Local Rule IA 6-1, jointly move for an extension
 31 as follows:

- 32 1. On September 22, 2021, Plaintiff filed a Complaint with this Court [ECF No. 1].
- 33 2. Synchrony was served with the Complaint on September 30, 2021.
- 34 3. Synchrony’s response to the Complaint is due by October 21, 2021.
- 35 4. The parties are engaging in preliminary discussions in this matter. In order to
 36 explore the possibility of an early resolution, Synchrony desires an extension of 28 (twenty-
 37 eight) days, up to and including November 18, 2021, to file a response to the Complaint.
- 38 5. Counsel for Synchrony conferred with counsel for Plaintiff regarding this Joint

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Motion. Counsel for Plaintiff agrees to the requested extension.

6. This Joint Motion is filed in good faith and not for dilatory or other improper purpose. Plaintiff would not suffer any prejudice by the Court permitting Synchrony the requested extension of time and has consented to the requested extension.

7. This is the first request for extension of time for Synchrony to respond to the Complaint.

DATED: October 15, 2021.

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/s/ Matthew R. Tsai

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Counsel for Defendant Synchrony Bank

/s/ Michael Kind

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Counsel for Plaintiff

ORDER

IT IS SO ORDERED.

Leayna J. Zouchah
UNITED STATES MAGISTRATE JUDGE

DATED: October 15, 2021

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